IN THE UNITED STATES DISTRICT COURT OF TENNESSEE, EASTERN DISTRICT

| JOHN DOE, |) | | |
|---------------------|---|-------------------|---------------|
| |) | | |
| Plaintiff, |) | | |
| |) | Civil Action No.: | 3:18-cv-00411 |
| |) | Jury Demanded, | |
| vs. |) | | |
| |) | | |
| ROSS UNIVERSITY |) | | |
| SCHOOL OF MEDICINE; |) | | |
| ADTLEM CORPORATION, |) | | |
| |) | | |
| Defendants |) | | |

JOHN DOE'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Plaintiff Jane Doe moves this Court for leave to file its Exhibit #1: **Exhibit University Security Officer Report**, to Complaint under Federal Rule of Evidence 702 and Federal Rules of Civil Procedure 26 and 37 under seal pursuant to Fed. R. Civ. P. 5.2(d) and Administrative Order No. 167, Section 5.07. In support of this motion, Plaintiff states as follows:

- Exhibit #1 to Complaint contains documents from a University Security Investigation
 Report that contains information on Plaintiff and other students that is protected under
 The Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; 34 CFR
 Part 99.
- 2. Under FERPA, a student has the right to control disclosure of their education record. An education record, as defined by FERPA, includes disciplinary records, grades and course

schedules. Exhibit #1 to the Complaint contains this information on Plaintiff and other

students in Plaintiff's university.

3. Plaintiff therefore requests leave to file these documents, contained in Exhibit #1 to

Complaint, under seal.

4. Redacted versions of Exhibit #1 of Complaint, without such information designated as

protected, is being filed by Plaintiff in the normal process.

WHEREFORE, Plaintiff respectfully requests this Court grant its motion to file its

Exhibit #1: Exhibit University Security Officer Report, to Complaint Under Federal Rule of

Evidence 702 and Federal Rules of Civil Procedure 26 and 37 under seal.

Dated: September 28, 2018

Respectfully Submitted,

/s/ Michelle Owens

Michelle Owens

Agee Owens, LLC

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CERTIFICATE OF SERVICE

I certify that on September 28, 2018, the foregoing Complaint was served by the courts ECF filing system, U.S. Mail, or email on the following:

Leah Heinecke-Krumhus
Counsel for Ross University and Adtlem
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Counsel for Defendant

| /s/ Michelle Owens | |
|--------------------|--|
| Michelle Owens | |